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9 UNITED STATES DISTRICT COURT
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DISTRICT OF NEVADA

12 DR. F. VICTOR RUECKL, an individual,

CASE NO. 2:19-cv-02186-KJD-NJK

13 Plaintiff,

14 v.

15 INMODE LTD., a foreign limited liability
corporation; DOES 1 – 10, INCLUSIVE; AND
ROE CORPORATIONS 11-20, INCLUSIVE,

16 Defendants.

17 STIPULATION AND PROPOSED
ORDER TO EXTEND TIME TO FILE
OPPOSITION TO DEFENDANT
INMODE LTD.'S MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT OF MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P.
12(b)(2) AND (6) [DKT NO. 10]

18 **[SECOND REQUEST]**

19 Plaintiff Dr. F. Victor Rueckl ("Dr. Rueckl"), by and through his attorneys, LIPSON
20 NEILSON P.C., and Defendant InMode, Ltd., by and through its attorneys,
21 RUSHFORTH LEE & KEIFER LLP, hereby stipulate to continue Plaintiff's deadline to
22 respond to InMode Ltd.'s ("InMode" or "Defendant") Motion to Dismiss Pursuant to Fed.
23 R. Civ. P. 12(B)(2) and (6) [DKT. NO. 10]:

24 **STIPULATION**

25 1. On February 7, 2020, Defendant filed a Memorandum of Points and
26 Authorities In Support Of Motion To Dismiss Pursuant To Fed. R. Civ. P. 12(B)(2) and
27 (6) [Dkt No. 10] (hereafter, "Motion to Dismiss") in response to the Complaint filed on
28 December 19, 2019 [Dkt. No. 1].

1 2. Plaintiff's Opposition to Defendant's Motion to Dismiss ("Opposition") is
2 currently due on March 6, 2020, pursuant to the Order to Extend Time to File Opposition
3 to Defendant's Motion to Dismiss [Dkt. No. 12].

4 3. Counsel for Plaintiff requires additional time to adequately respond to the
5 Motion to Dismiss due to the handling partner being out of the office for work-related
6 travel.

7 4. Plaintiff also needs additional time to ascertain and verify factual matters
8 pertinent to the Opposition.

9 5. In order to adequately respond to the Motion to Dismiss, Plaintiff
10 respectfully requests an extension up to and until **March 20, 2020**.

11 6. Defendant's counsel has conferred with Plaintiff's counsel regarding this
12 Stipulation and both parties agree to the extension.

13 7. This Stipulation is made in good faith and not for any dilatory or other
14 improper purpose. Defendant will not suffer any prejudice if the Court permits Plaintiff
15 the requested extension. Defendant has consented to the extension.

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8. This is the second request for an extension of time for Plaintiff to respond to Defendant's Motion to Dismiss.

LIPSON NEILSON P.C.	RUSHFORTH LEE & KIEFER LLP
<p>/s/ Jonathan K. Wong By: _____ JOSEPH P. GARIN, ESQ. Nevada Bar No. 6653 JONATHAN K. WONG, ESQ. Nevada Bar No. 13621 9900 Covington Cross Drive, Suite 120 Las Vegas, Nevada 89144 (702) 382-1500</p> <p>Attorneys for Plaintiff Dr. F. Victor Rueckl</p>	<p>/s/ Matthew W. Park By: _____ MATTHEW W. PARK, ESQ. Nevada Bar No. 12062 1707 Village Center Circle, Suite 150 Las Vegas, Nevada 89134 (702) 255-4552</p> <p>Attorneys for Defendant InMode, Ltd.</p>

ORDER

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

DATED: March 6 , 2020.